

# **Exhibit 1**

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**From:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Sent:** Thursday, May 18, 2023 2:37 PM  
**To:** Wylie, Joseph  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy; Roxanna K. Laswell; Mueller, Nicole C.  
**Subject:** RE: 2023-04-17 Request for Discovery Conference - final (003)

**External Sender:**

Joe, Mr. Moore just told us he wants to withdraw as a plaintiff because he has “too much other stuff going on” right now.

He never gave us any such indication before now, but obviously we have no choice but to dismiss his case.

Rick

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**From:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Sent:** Thursday, May 18, 2023 9:49 AM  
**To:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>; Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Subject:** RE: 2023-04-17 Request for Discovery Conference - final (003)

In reliance on your previous communications, I will cancel (again) my travel reservations for tomorrow’s deposition.

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**From:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Sent:** Wednesday, May 17, 2023 6:50 PM  
**To:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>; Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Subject:** Re: 2023-04-17 Request for Discovery Conference - final (003)

1. Surely you work weekends. You can do your preparation then.
2. The deposition date was agreed and noticed. Absent exigent circumstances, he is obligated to attend.

Compass will not produce any additional discovery materials until Moore is deposed and Carter is scheduled.

On May 17, 2023, at 5:52 PM, Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)> wrote:

Joe, two reasons:

1. While I was away, the federal court in another case set a hearing for the morning of May 22 on several motions including a very complicated motion to dismiss, and I need the time to prepare.

2. As it happens, Mr. Moore is no longer available on the 19<sup>th</sup> but is available on the dates I gave you.

Rick

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**From:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Sent:** Wednesday, May 17, 2023 11:39 AM  
**To:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>; Mueller, Nicole C. <[Nicole.Mueller@klgates.com](mailto:Nicole.Mueller@klgates.com)>  
**Subject:** RE: 2023-04-17 Request for Discovery Conference - final (003)

Rick, we have rescheduled this deposition repeatedly. We scheduled it on 5/19 based on your representation that that date will work. We are not willing to reschedule absent a compelling justification on your part.

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**From:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Sent:** Wednesday, May 17, 2023 11:34 AM  
**To:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>  
**Subject:** RE: 2023-04-17 Request for Discovery Conference - final (003)

Hi, Joe –

I just got back from Israel last night. We need to move the Moore dep to next Monday afternoon or anytime next Wednesday.

Rick

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**From:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Sent:** Tuesday, May 16, 2023 2:59 PM  
**To:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>  
**Subject:** RE: 2023-04-17 Request for Discovery Conference - final (003)

Richard, following up on this. Also, please confirm that Mr. Moore's deposition is proceeding on Friday.

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**From:** Wylie, Joseph  
**Sent:** Monday, May 1, 2023 2:41 PM  
**To:** 'Richard S. Cornfeld' <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>  
**Subject:** RE: 2023-04-17 Request for Discovery Conference - final (003)

Richard, please let us know if you will be representing Ms. Carter for her deposition, and if so, please provide us some dates that will work.

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**From:** Richard S. Cornfeld <[rick@ghalaw.com](mailto:rick@ghalaw.com)>  
**Sent:** Wednesday, April 19, 2023 5:29 PM  
**To:** Wylie, Joseph <[joseph.wylie@klgates.com](mailto:joseph.wylie@klgates.com)>  
**Cc:** [robert@aswtlawyers.com](mailto:robert@aswtlawyers.com); Daniel S. Levy <[dlevy@cornfeldlegal.com](mailto:dlevy@cornfeldlegal.com)>; Roxanna K. Laswell <[roxie@ghalaw.com](mailto:roxie@ghalaw.com)>  
**Subject:** 2023-04-17 Request for Discovery Conference - final (003)

Joe, in light of your agreement with us on Issue 1, we have taken that out of our section of the Request for Discovery Conference. We also changed the intro accordingly. But we didn't want to touch your section, so please take a look at it and modify it accordingly, as you see fit. We should be able to get this on file tomorrow.

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